

National Advisory Council for Environmental Policy and Technology

April 25, 2003

Governor Christine Todd Whitman
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Governor Whitman:

On behalf of the National Advisory Council for Environmental Policy and Technology (NACEPT), I am pleased to forward comments and recommendations regarding the Agency's draft 2003-2008 Strategic Plan. The recommendations were developed and fully endorsed by the NACEPT Council.

NACEPT appreciates both the importance of, and the complexity in, developing a Strategic Plan for EPA. Key highlights of the recommendations are presented below, with more detailed comments discussed in the enclosure. Our comments offer advice on ways the Agency can enhance the current draft of the Strategic Plan. Key recommendations for your consideration are outlined below:

- ❑ We strongly encourage that EPA link the Strategic Plan with the Report on the Environment in both formatting and timing to facilitate the establishment of goals and objectives, and to provide a progress report on accomplishments.
- ❑ EPA should consider presenting each of the goals with the percentage of EPA's budget and personnel devoted to the goal. This would provide some level of certainty to EPA's commitment to achieving the objectives and targets identified for the goal.
- ❑ While NACEPT agrees with the value and importance of optimizing the resources available to EPA, states, local government and tribes, the numerous references to achieving various objectives/targets through involvement of these partners provide few details on how and what will be actually achieved. Clarification of the roles of federal, state, local and tribal agencies should be an integral part of the Strategic Plan.
- ❑ As EPA's Strategic Plan fully matures, the Agency will continue to face new challenges in protecting our nation's environment. EPA must remain both vigi-

lant and flexible; ever scanning the horizon to identify emerging environmental challenges, and swiftly committing itself to address the challenges it identifies.

NACEPT appreciates this opportunity to offer these recommendations on the EPA draft Strategic Plan, and looks forward to assisting the Agency to meet its mission and goals.

Sincerely,

Dorothy Bowers, Chair
National Advisory Council for
Environmental Policy and Technology

Enclosure

cc: Linda Combs, Chief Financial Officer
David Ziegele, Director, OPAA/OCFO
Daiva Balkus, Director, OCEM
Gwen Whitt, NACEPT Designated Federal Officer

**NATIONAL ADVISORY COUNCIL FOR
ENVIRONMENTAL POLICY AND TECHNOLOGY (NACEPT)**

RESPONSE TO EPA'S DRAFT 2003-2008 STRATEGIC PLAN

April 25, 2003

GENERAL

- The 2003-2008 Draft Strategic Plan provides a comprehensive set of objectives to enhance the protection of human health and the environment. EPA's leadership and personnel are commended for this extensive effort.
- NACEPT recognizes that a strategic plan emphasizes goals and is not a tactical plan concerned with the costs and benefits of alternative means of reaching goals. NACEPT's comments reflect that the draft plan tends to combine strategic and tactical planning approaches in some sections and not in others. NACEPT recommends greater consistency in the approach and suggests that the EPA 2003-2008 Strategic Plan be as explicit as possible about the quantitative identification of goals in terms of historical series and points for environmental indicators.
- In order to increase the credibility and usefulness of the Strategic Plan and the Report on the Environment, EPA is urged to link the preparation of these documents in both formatting and timing to facilitate the establishment of goals/objectives and then provide a progress report on accomplishments. EPA's announcement of the intention to develop environmental indicators with a coordinated timeline to demonstrate progress in protecting human health and the environment should be integrated into both the Strategic Plan and the Report on the Environment.
- While NACEPT agrees with the value and importance of optimizing the resources available to EPA, states, locals, and the tribes, the numerous references to achieving various objectives/targets through involvement of these partners provide few details on how and what will be actually achieved. Clarification of the roles of federal, state, local, and tribal agencies should be an integral part of the Strategic Plan. Further, the identification of EPA strategic goals should include some tactical discussion and quantified estimates of the anticipated costs to the burdened agencies and benefits to the public.
- EPA should incorporate a section in the Strategic Plan section on the roles of other federal agencies that are crucial to a successful implementation of the identified goals. These federal partners are key participants in the evaluation and management of the nation's natural and environmental resources, including adherence with the National Environmental Policy Act (NEPA).

- The Means and Strategies to achieve Goals 1 through 4 do not address the actions that will be required of the regulated community to achieve the Goals, nor do they address the barriers that the regulated community will face in achieving compliance. Rather, they focus almost exclusively on the activities that EPA and its regulatory partners will undertake to enhance implementation of the Agency's traditional programs. In setting its Objectives under these Goals, EPA needs to assess the efforts required of, and the costs imposed on, the regulated as well as the regulator community, and provide for comprehensive Compliance Assistance (CA) to empower the regulated community to attain, and go beyond, compliance with regulations. Moreover, EPA needs to explore what types of programs may be appropriate in lieu of command-and-control regulation and what changes in agency activities (including legislative authorization) may be necessary to implement those alternate approaches.
- It is difficult to judge the appropriateness of specific numerical goals -- such as percent compliance -- outside the proper contextual setting. Where possible, numerical goals throughout the Strategic Plan should be framed within discussion of legislative intent, overarching strategies, Agency expectations, and earlier implementation plans or performance goals. Only by comparing numerical goals with baseline data, can it be determined whether such goals are too aggressive, too passive, well suited to their purpose, or deserving of reconsideration in light of practical implementation experience.
- Consideration should be given to some presentation under each of the GOALS that provides insight to the percentage of EPA's budget and personnel devoted to the GOAL -- at least a range, such as 12-15%. This would provide some level of certainty to EPA's commitment to achievement of the objectives/targets identified for the GOAL.
- The draft plan reads as if prepared by numerous authors. Excessive wording can be found throughout the draft. NACEPT recommends that the final version be more concise with a consistent format from GOAL to GOAL.
- In places, wording excludes Puerto Rico, the Virgin Islands, and Guam, by not mentioning them. That apparently is not deliberate and should be corrected. Some Native Americans consider the term "Indian Country" derogatory. That probably should be addressed.

SUMMARY OF MAJOR POINTS RECOMMENDED:

GOAL 1: CLEAN AIR

- For clarity, it would be useful to list in the beginning of the discussion for GOAL 1 the entire list of objectives and sub-objectives.
- There is a need for a sharper focus and sense of urgency related to achieving the identified objectives for GOAL 1, especially a process to identify areas of greater importance and schedule for achieving targets.
- The draft strategic plan needs to be consistent in presenting strategic targets by providing quantitative proposed achievements (compared to a baseline). In some objectives, specific reductions in emissions are identified, in others, the targets are vague.
- More emphasis is needed on the magnitude of improvement related to the numbers or percentages presented in the draft. The priority use of available resources should be focused on obtaining the greatest result to achieve GOAL 1. It is not clear in the lengthy discussion that this is the case.
- The Research and Development (R & D) section should make a more convincing case that the R & D program will enhance the ability to achieve the specific numerical targets that are presented.
- A reader is likely to conclude that too much detail is presented in the draft related to GOAL 1.

GOAL 2: CLEAN & SAFE WATER

- It's important to present the discussion in a format that emphasizes the accomplishments to date and present the objectives to address the remaining challenges in a priority process. As currently drafted, much of the wording leads a reader to question the credibility of EPA and its partners' achievements thus far and their willingness to assign the necessary resource to ensure achievement of the objectives for GOAL 2.
- While some performance measures are identified in the objectives, the basis or justification of these measures should be expressed in clearer terms.
- The EPA needs to work with local agencies to identify the adequacy of existing water supply and sewage systems and water treatment facilities. Additionally, with population growth in urban areas, and as urbanization of rural areas continues, more emphasis should be placed on addressing the infrastructure capacity and improvements needed in the future to ensure clean and safe water for the increasing

population and the appropriate coordination of infrastructure development with land use decisions.

- Protecting sources for drinking water should place more emphasis on safety, including Homeland Security measures.
- Achievement of the objectives will require effective implementation of state, local, and tribal programs. With the budget challenges confronting these EPA partners, there is a great need for timely evaluation of their efforts with appropriate EPA action to ensure resources are in place to support achievement of the objectives for GOAL 2.

GOAL 3: PRESERVE & RESTORE THE LAND

- EPA needs to identify its role in land use since there is no statutory direction. The title of Goal 3 doesn't match well with the text. EPA should link the title of Goal 3 to the objectives and sub-objectives of this section.
- EPA should acknowledge that the stated objectives do not provide the tools to effectively achieve GOAL 3. More emphasis should be placed on working with EPA partners to identify and protect green spaces, wetlands, and sensitive lands (tribal, historic and prime agricultural lands).
- EPA should establish a baseline and procedures to monitor progress related to Preparedness for Emergencies, Response to Hazardous Releases & Oil Spills, and Prevention of Oil Spills. The discussion in the draft does not provide these factors.
- The discussion related to Waste Generation needs to focus on reduction of waste generation and not imply that the *status quo* will be acceptable. As a minimum, EPA should emphasize the progress in waste reduction and recycling over the past 15-20 years and acknowledge resources will focus on other pressing environmental problems.
- The Strategic Targets under "Prevent Dangerous Releases from RCRA Facilities" should be re-stated to emphasize the positive accomplishments. As stated, there is ambiguity and lack of clarity relative to permits and approved controls.
- Clearer baselines should be established for "Cleanup and Reuse of Contaminated Land." The percentages and numbers presented leave the reader with insufficient factual information to understand the objective.
- As with GOAL 1, there is excessive wording in the discussions related to GOAL 3. Fewer words and greater clarity are encouraged.

GOAL 4: HEALTHY COMMUNITIES & ECOSYSTEMS

- Fewer and more concise targets should be presented under Objective 4.1. Baseline factors should be clearly identified related to chemicals, quantities, acreage, etc.
- Information should be clearly presented to demonstrate that the appropriate resources will be dedicated to achieve the objectives. In addition, a concise discussion on the measurements to be used for documentation of progress should be added.
- The draft needs to establish baseline information related to impacts and risks pertaining to Environmental Justice communities. Clarify the predicted percentage for communities to be added to those currently working with EPA to address EJ issues (50% target).
- Targets identified for Objectives 4.3 (Ecosystems) should be clear on the resources to be available to ensure achievement. As presented, the targets are vague.
- EPA should support an expedited Homeland Security schedule (sooner than 2008) to provide enhanced security in the chemical and oil industry. In addition, the expedited approach should be applied to public water systems.

GOAL 5: COMPLIANCE & ENVIRONMENTAL STEWARDSHIP

- NACEPT gave EPA extensive comments on the Strategic Plan architecture draft with considerable emphasis on compliance and EPA's previous commitment to Compliance Assistance (CA). Yet, the current draft Strategic Plan does not incorporate a fully integrated program of CA, voluntary programs, and partnerships which could enhance achievement of the targets.
- The Means and Strategies to achieve Goals 1 through 4 do not address the actions that will be required of the regulated community to achieve the Goals, nor do they address the barriers that the regulated community will face in achieving compliance. Failure to integrate CA and other non-regulatory approaches into all of the Program Offices' Objectives will likely result in continued over-reliance on enforcement of command-and-control rules instead of the win-win scenarios engendered by a fully integrated program of CA, voluntary programs, and innovative partnerships.
- As "developer/wholesaler" of CA products, EPA needs to clarify how the agency will include management of the CA delivery network. EPA will need to develop, implement and facilitate a validated measurement system for use by the full spectrum of CA providers.
- Sub-objective 5.1.3 (Monitoring & Enforcement) identifies three specific targets that create unique verification and measurement challenges. EPA needs to explain how

they will develop, implement and facilitate a validated system for measuring behavior changes by the regulated community.

- NACEPT concurs with EPA's strategic targets for Federal Facilities and federal agencies as being achievable by 2008 and as clear signals to other stakeholders that the federal government must lead by example.
- EPA will need to enhance its information collection to include production indices or other suitable economic data to ensure assessment of production-normalized TRI chemical releases and waste production.
- EPA should further assess whether the environmental improvement targets for "Performance Track" members constitute a sufficiently ambitious goal. At the same time, EPA should strive to eliminate the distinctions between its environmental performance programs and seek a focused approach within a suite of performance tools.
- In the scientific and innovative arena, EPA must assume the leadership role in identifying, evaluating and adopting successful approaches to environmental protection.
- EPA is urged to continue efforts to integrate joint planning and priority-setting across media programs with their partners to optimize the use of available resources in achieving environmental compliance. Beyond the Strategic Plan, EPA needs to implement additional objectives to achieve the efficiencies of integrated programs.

Appendix

Detailed Comments and Suggestions on Goals from the Council

DETAILED COMMENTS AND SUGGESTIONS ON GOALS

GOAL 1: CLEAN AIR

Goal 1 is more fully defined as: “Protect and improve the air so it is healthy to breathe and free of levels of pollutants that harm human health or the environment.”

The approach in the Strategic Plan is to bring forward a series of Objectives and Sub-objectives that are designed to advance progress toward achieving the Goal. Each of these particular lists is followed by a discussion of Means and Strategies expected to contribute to achieving the objective.

For clarity sake, it is useful to list in a single place the series of objectives and sub-objectives that are present to advance the purpose of the Goal.

Objective 1.1: Maintain and Improve Outdoor Air Quality

Sub-objective 1.1.1: Reduce Emissions from Electric Generating Units and other Stationary Sources through Federal Regulations.

Sub-objective 1.1.2: Reduce Emissions from Mobile Sources through Federal Regulations.

Sub-objective 1.1.3: Implement, Attain, and Maintain Air Quality Standards in Areas throughout the Country.

Sub-objective 1.1.4: Reduce Air Toxics Risk at the Local Level

Objective 1.2: Indoor Air

Objective 1.3: Atmospheric Change

Sub-objective 1.3.1: Climate Change

Sub-objective 1.3.2: Stratospheric Ozone

Objective 1.4: Radiation

Sub-objective 1.4.1: Radiation Protection

Sub-Objective 1.4.2: Emergency Response

Objective 1.5: Science/Research

Sub-objective 1.5.1: Science to Support Air Programs

Sub-objective 1.5.2: Air Pollution Research

This breakdown provides a summary of those areas that the plan brings forward as targets of action for the next five years. A major test of importance relies on consideration of the numerical targets that are called for or expected within each of these areas. The

numerical targets in critical ways define the level of importance and level of attention the objectives and sub-objectives will receive.

Looking specifically at Objective 1, addition of the numerical targets provides information about the relative emphasis that is expected to be provided.

Objective 1.1: Maintain and Improve Outdoor Air Quality

Air Quality for ozone (8-hr) will improve to healthy levels for 52 percent of the people living in areas determined to have poor air quality in 2001.

Air Quality for fine particles will improve to healthy levels for 12 percent of the people who are living in areas determined to have poor air quality for fine particles in 2001.

Healthy air for the other pollutants will be maintained for the 123.7 million people that had healthy air in 2001.

Sub-objective 1.1.1: Reduce Emissions from Electric Generating Units and other Stationary Sources through Federal Regulations.

Strategic Targets:

- ***By 2010, electric generating unit emissions of sulfur dioxide will be reduced by 4.6 million tons from their 2000 level of 11.2 million tons.***
- ***By 2008, electric generating unit emissions of nitrogen oxides will be reduced by three million tons from their 2000 level of 5.1 million tons.***
- ***By 2010, electric generating unit emissions of mercury will be reduced by 22 tons from their 2000 levels of 48 tons.***
- ***By 2007, federal air toxics regulations will reduce air toxics emissions by 2.2 million tons from their 1993 level of 3.7 million tons.***
- ***By 2009, EPA will promulgate the last group of area source standards, thus ensuring that 90 percent of the areas source emissions of the 30 area sources listed in the Urban Air Toxics Strategy is regulated.***

Sub-objective 1.1.2: Reduce Emissions from Mobile Sources through Federal Regulations.

- *Similar quantitative targets are presented in terms of millions of tons of reduction for various types of air emissions.*

Sub-objective 1.1.3: Implement, Attain, and Maintain Air Quality Standards in Areas throughout the Country.

- *In 2004, complete area designations, promulgate implementation rules, begin implementing the 8-hour ozone and PM2.5 NAAQS.*
- *By 2008, EPA will complete a policy on when Federal Implementation Plans re-appropriate to bring Clean Air Act programs to Indian country.*
- *By 2008, the amount of air monitoring in Indian country will increase by 10 percent over FY2003 levels of 158 monitors.*

Sub-objective 1.1.4: Reduce Air Toxics Risk at the Local Level

- *By 2004, publicly release the revised National Air Toxics Assessment that is based on the 1999 inventory, and continue to update this national assessment of emissions, exposure, and risks from air toxics every three years.*
- *Air Toxics Monitoring: To be developed.*
- *By 2010, the tribes and EPA will have the information and tools to characterize and assess trends for 20 percent of Indian tribes from 2003 level of 1.2%.*

There are distinct differences in the content and approach of the various strategic targets. Some of them are very quantitative, while others mention work that will be done. There are many approaches to develop a strategic plan, and different views about what it should contain. However, the easiest to understand seems to be one that presents a problem or expected achievement, and then lays out the avenue to address it along with the resources required. In this case, because this is a strategic plan for the EPA, it is logical to assume that the problem or expected achievement will be related to the environment. In fact, we would expect the targets to be some quantifiable environmental improvement.

The targets presented in Objective 1.1, and Sub-objectives 1.1.1 and 1.1.2 provide just this type of targeted environmental improvement. A reader may quibble with the magnitude of the targets, discuss the priorities, and ask if these are stretch targets or straight-line extension of what is already happening. They do however provide hard numbers that provide expectations for measurable improvement to defined environmental challenges. These expectations are followed by a section termed “Means and Strategies” that describes the beliefs about how the targets can be met.

The targets presented for Sub-objectives 1.1.3 and 1.1.4 are of a different type. They present goals that largely discuss completion of a work product or being prepared to provide environmental tools to larger numbers of people. From the way those targets are presented it is not clear what environmental challenges they will overcome or improve, and very little information is presented that describes the magnitude of any improvement that is expected or desired to be achieved. The targets that are presented actually seem to be more in line with means or milestones along the way that will help achieve a certain environmental target. These two targets could be strengthened considerably by recasting them in that context. For example, for Sub-objective 1.1.3, the target seems to refer back to the overall targets described earlier for Objective 1.1. If this is so, it is not clear why there should be a set of sub-objectives trying to achieve the same result.

A similar comment can be made for Sub-objective 1.1.4. The strategic targets described there, in principle, also refer back to the overall targets in Objective 1.1. However, in neither place are there really any numerical goals for improvement presented. Maintenance of the *status quo* seems neither to indicate a need for a strategic program nor calling out of an objective.

These last two sub-objectives would seem to be better placed in the “Means and Strategy” section, because with their present placement, they make the objectives and sub-objectives appear unfocused to the reader. This lessens the impact of the section.

Detail presented in the “Means and Strategy” section provides some other opportunities for a reader to be confused. For example, in the section titled “Means and Strategies to Achieve Objective 1”, there are very long descriptions of specific EPA air quality programs. Although the EPA programs and activities appear to be of high quality and productive of useful results, it is difficult to see how they relate to the objectives, sub-objectives, and strategic targets. There is no indication of priorities within the means and strategy discussion, providing no guidance to the reader about relative importance in order to achieve the objectives. One can argue that the Goal is much larger than the Objectives or the Sub-objectives. That is true, but the existence of a Strategic Plan indicates that for five years, in this case, certain needs have priority. That is not clear in this section. For example, the last paragraph of the Means and Strategy section has a lengthy discussion about international programs regarding air. This seems not to add a great deal to the objectives and could be shortened significantly.

An overall impression is that the Air Section appears to be more of a thorough presentation of EPA activities looking for a strategic mission, rather than a selected presentation of EPA programs that support the strategic objectives of the goal. This is not simply a subtle nuance, instead, the impression will have great impact on how the Strategic Plan will be received and considered by the EPA partners, stakeholders, and the public.

Similar comments can be made about the other Objectives and Sub-objectives. Although many of them do provide numerical strategic targets, the discussions of Means and Strategies do not help establish priorities or indicate which of the programs should receive particular emphasis to facilitate reaching the targets.

The section on Research and Development, although providing important information about the R&D program related to air, also fails to make a convincing case about how the program relates to the specific numerical targets that have been presented.

In general, a reader is likely to conclude that too much detail is presented in the Air Section of the EPA strategic plan without providing a sense of relative importance and connection to the national air targets that are presented. Achieving the full impact deserved by a Strategic Plan of this magnitude will require a sharper focus and providing a sense of urgency within the Agency in selecting areas of greater importance (for this 5-year period) in achieving the targets.

GOAL 2: CLEAN AND SAFE WATER

Introduction: Goal 2- Page 1

- a) The wording is awkward in the first couple of sentences beginning “*Thirty years ago...*”
- b) While there is considerable data on this page, it is not clear where it came from. Actual numbers would be more powerful than narrative phrases such as “significantly slowed” and “measurable improvement.”

Introduction: Goal 2- Page 2

- a) Population growth is one source of added infrastructure strain, however, so is population shift as growth in urban areas outstrips infrastructure capacity; these needs must also be addressed.

Objective 2.1: Protect Human Health

Sub-objective 2.1.1: Water Safe to Drink.

Objectives: It is unclear how these performance measures – such as a 95% service rate by 2008 – are chosen. The reader is unable to determine whether they are aggressive or weak. How do they match up with past goal-setting efforts? Obviously we are not meeting previous goals if our aspiration is that by 2008, 95% of the water systems will be where they were supposed to be in 2001. There should be some context in which to judge this level of effort.

Sub-objective 2.1.3: Water Safe for Swimming.

The plan only calls for 10% of waters swimmable by 2008. If it took us 30 years to get to 10%, will it take us 300 years to meet the goals of the CWA?

Means and Strategies to Achieve Objective 1: *Protecting and Improving Drinking Water, Developing Drinking Water Standards*

“If there is adequate information, EPA will determine whether a new risk-based drinking water standard is necessary.” This section seems a little light on specifics. Are there any areas of focus for the Agency, such as on endocrine disruptors?

Means and Strategies to Achieve Objective 1: *Protecting and Improving Drinking Water, Support Sustainable Drinking Water Infrastructure*

Revolving Loan Fund: While it is good to have a revolving loan fund, has the fund approach been a successful replacement for the old grant program? Are local governments truly picking up the slack, or is the loan fund resulting in a large infrastructure debt being accumulated. The same question exists for wastewater treatment capacity (probably a bigger problem).

Means and Strategies to Achieve Objective 1: *Protecting and Improving Drinking Water, Prevent Source Water Contamination*

Those entities which are “voluntarily” working to prevent source water contamination should be supported. Is a volunteer approach quite common or rare? What about those that are not progressing voluntarily?

Means and Strategies to Achieve Objective 1: *Safe Fish and Shellfish, Fish Safe to Eat*

“Improving water and sediment quality” - no goals are specified. Why are some goals quantified, while others are given a narrative sweep?

Means and Strategies to Achieve Objective 1: *Safe Swimming Waters, Control Combined Sewer Overflows*

87% of 34% = about 30% of the 770 communities with CSO have “substantially implemented their plans.” Is that an acceptable level of performance? If not, what’s the plan?

Objective 2: Protect Water Quality

Sub-objective 2.2.1: Improve Water Quality on a Watershed Basis

Sub-objective 2.2.2: Improve Coastal and Ocean Waters

Again, there is no context in which to judge the goals. Are they aggressive or weak?

Means and Strategies to Achieve Objective 2: *Improving Water Quality on a Watershed Basis, Develop Effective Watershed Plans and TMDLs*

TMDLs are perceived as being a powerful, overarching strategy for dealing with non-point source pollution. Yet they are not given a proportionally large role in the Strategic Plan. How much will TMDLs improve surface water quality? If we did nothing other than TMDLs, how would the other goals be impacted?

Means and Strategies to Achieve Objective 2: *Improving Water Quality on a Watershed Basis, Control Nonpoint Pollution*

- a) ***“Forge partnerships with a broad range of agricultural interests...”*** How will this be accomplished? If those partnerships aren’t in effect now, what will make them happen?
- b) Strengthen the NPDES program. While there may be merit in strengthening what has been a very successful program, in many states, the majority the non-use designations result from NPS pollution. One wonders if it is fair, or the most productive use of Agency resources to tighten the screws on NPDES discharges. Would more impact be made by investing resources in more aggressive control of NPS?

Means and Strategies to Achieve Objective 2: *Improving Water Quality on a Watershed Basis, Support Sustainable Wastewater Infrastructure*

The same concern exists as was mentioned with the Drinking Water Revolving Loan Fund. We should be glad it's there, but is a wastewater infrastructure debt accumulating nationally? Do we have the fiscal capacity to expand plant capacity in proportion to expanding, sprawling communities?

Means and Strategies to Achieve Objective 2: *Improving Coastal and Ocean Waters, Reducing Vessel Discharges*

This sounds like a good approach, but there are no numbers given at all. Is this a significant problem? Does it merit a specific element in the Strategic Plan?

Objective 2.3: Science/Research

“By 2008, provide and apply a sound scientific foundation to EPA’s goal of clean and safe water...” It's hard to imagine a more impolitic statement. Better language would be to “expand,” “improve upon,” or “strengthen” the sound foundation that is already in place.

Means and Strategies to Achieve Objective 3: *Clean and Safe Water Science, Methods for Valuing Ecological and Recreation Benefits*

Cost/benefit analysis is tricky, but it could be a profoundly powerful tool in advancing environmental well being.

Means and Strategies to Achieve Objective 3: *Clean and Safe Water Research, Research to Protect Human Health*

“Develop scientifically sound data and approaches to assess and manage risk...” Have we not been using sound data and approaches up to this point? This statement is an ideal opening for opponents of more progress to demand “good science” before supporting compliance with environmental regulations. Better language would be to “improve,” “enhance” or “strengthen” data and approaches.

Means and Strategies to Achieve Objective 3: *Clean and Safe Water Research, Research to Protect Water Quality*

Decisions on local land use are critical to water quality. One vastly underutilized human capital is local policymakers. The Agency should strive to better educate planning and city/county commissions about environmental consequences of siting decisions. This is especially true regarding siting facilities near or over drinking water sources and transportation planning. It would be very useful to the Agency to have local policymakers informed on and actively implementing TMDLs.

Program Evaluation

This is a good mention of program evaluation studies, although it is not clear that findings from these studies have been integrated into the Strategic Plan. In some states, well meaning regulators are not supported by Governors and/or legislators. Surely, one very important element of a Strategic Plan would be review of implementation performance at the state and local levels and – where necessary – intervention or even withdrawal of program primacy. What are the rules of engagement? What performance measures are in place regarding performance of state and local agencies?

Other:

September 11 provided a painful insight into our vulnerability to terrorism. Are our water supplies adequately protected from malicious intent? If not, that ought to be addressed in the Strategic Plan. Security planning ought to consider domestic as well as international terrorist possibilities, and should also speak to invading species and other natural occurrences.

Overarching Concerns:

- a) Give data rather than subjective narratives, let reader interpret significance.
- b) Justify performance measures.
- c) Evaluate infrastructure capacity and adaptability.
- d) Don't say anything that undermines the credibility of the Agency and its programs.
- e) Integrate land use planning.
- f) Review of implementation effectiveness and performance measures of state and local government ought to be a part of the Strategic Plan.
- g) Safety of water supplies.

GOAL 3: PRESERVE AND RESTORE THE LAND

EPA needs to identify its role in land use; it is not clear how the Agency can influence land use decisions since there is no statutory direction. Nonetheless, land use decisions significantly influence our ability to reach national environmental quality goals.

The title of this goal does not seem to be consistent with the substance of the remainder of the section. EPA should specifically articulate the linkages of the objectives and sub-objectives of this section with the title.

Sub-objective 3.1.1: Preparedness for Emergencies

The sub-objective is stated in terms of increasing response readiness. However, it is difficult to imagine how response readiness can be measured in percentage terms. While there is reference to a percentage increase from a baseline established in fiscal year 2003, how would that baseline be measured – that is, what is the unit of measurement and what data would be collected to establish the baseline?

Is there some standard that already exists for measuring emergency preparedness – that is, are there ways in which state and local agencies or organizations are already measuring emergency preparedness that could or would be used by EPA to evaluate its preparedness? Or, would EPA be establishing new measures for this purpose. In either case, the way in which EPA would establish a baseline and monitor progress needs to be clarified.

Sub-objective 3.1.3: Prevent Oil Spills

The sub-objective calls for reducing releases by increasing the number of oil facilities that are in compliance from 3,525 to 6,000, *where the universe of oil facilities is about 415,000*. Does this mean that at present only 3,525 out of 415,000 (0.85%) are in compliance? If so, then even if EPA achieves its objective, then having 6,000 facilities in compliance still only represents a compliance rate of 1.4%.

If there is such a widespread compliance problem with oil facilities, then it seems that a much more aggressive objective is necessary. If the compliance rate is actually much higher than is suggested in the way the sub-objective is stated, then the wording of the sub-objective should be changed to make it clearer.

Sub-objective 3.2.1: Reduce Waste Generation and Increase Recycling

One of the strategic targets calls for maintaining the national average municipal solid waste generation at 4.5 pounds per person per day. Since it is national policy to focus efforts on reducing waste generation through source reduction and better environmental stewardship efforts, this is not an ambitious goal. *Per capita* waste generation rates have remained at about this level since 1990. If the US population continues to grow, yet *per capita* waste generation is simply maintained, then waste generation will continue to

increase in absolute terms. The target suggests that EPA is resigned to maintaining the *status quo*. The implication is that the nation is incapable of furthering the policy of waste reduction.

Many experts in the solid waste management field will argue that there are sound reasons why the *per capita* generation rates cannot be easily lowered. And, using environmental risk assessment in establishing environmental priorities may suggest that less emphasis on solid waste management is needed to protect public health and the environment in comparison to other priorities in water, air, and healthy communities and ecosystems. However, it is disingenuous to espouse a waste management policy that places waste reduction at the top of the hierarchy while setting targets that run counter to that policy. The EPA Strategic Plan should either set a more ambitious target to make its objectives consistent with existing policy, or provide some explanation as to why such a target is not feasible over the planning horizon of this strategic plan. This explanation need not be cast in negative terms. Instead, there could be a recognition of progress that has been made in waste reduction and recycling over the past 15-20 years and acceptance of a “maintenance” policy to ensure that the results of this progress will not erode as emphasis is shifted to more pressing environmental problems.

Sub-objective 3.2.2: Prevent Dangerous Releases from RCRA Facilities

One of the strategic targets states that *“approximately 36% of the facilities that are due for permit renewals by the end of 2006 will have updated controls approved by the end of 2008.”*

Is it reasonable to conclude from reading this target that limited resources, (in terms of both EPA permit staff and perhaps industry cost requirements), are the most likely barrier to setting a higher target for facilities having updated controls?

However, even if true, there appears to be a disconnect between the title of the sub-objective – that is, to prevent *dangerous* releases – and the target that only calls for 36% of the facilities needing permit renewals having updated controls by 2008. Is it fair to assume that while 64% of the facilities due for renewals in 2006 will not have updated controls by 2008, these facilities can continue to operate with existing controls without creating a high risk of releasing dangerous substances into the environment? In other words, controls under current permits will continue to function adequately while the target for updating controls is increased over time. If this is the situation, then perhaps there needs to be more acknowledgment or discussion of the administrative and cost requirements associated with permit renewals and new control technologies and how the level of risk from releases will not increase. If this is not the situation, and in fact without updated controls, the 64% of RCRA Facilities needing permit renewals do pose a greater risk, then the target should be more ambitious.

Sub-objective 3.3.1: Control Risks at Contaminated Sites

One of the strategic targets indicates that *“By 2008, EPA and its partners will determine that cleanups are completed at 105,000 LUST sites.”* There is no reference point to determine whether this target is modest or ambitious. Reference was made to 698,000 active Underground Storage Tanks (USTs) in the discussion on preventing leaks from USTs. And, Sub-objective 3.2.3 calls for *“.... increasing the percentage of UST facilities that are in significant operational compliance from 65% to 80%.”* However, this only provides information on active sites. An estimate of how many *inactive* sites exist and may be leaking was not provided.

Sub-objective 3.3.2: Make Land Available for Reuse (also Sub-Objective 4.2.3: Brownfields)

The Sub-objective 3.3.2 calls for making more lands available for reuse. Besides the objective lacking any numerical target, there is no benchmark to assess whether a numerically based objective is meaningful. In other words, there is no inventory of lands measured in acres, assessed value, or market value against which one could assess progress.

Sub-objective 3.3.3: Maximize Potentially Responsible Party Participation at Superfund Sites

Officials at EPA have been publicly stating for a number of months that protecting the balance of the Superfund Trust Fund and tax payer resources in the cleanup of NPL sites is a priority. However, there is no emphasis on this within the Strategic Plan. What is also missing is the complete lack of connection between bankruptcies of RCRA facilities (both TSD and non-TSD) that wind up becoming Fund lead NPL sites. The Agency should state as an objective under this section that it will work to strengthen Financial Assurance requirements at RCRA TSD facilities and explore mechanisms to develop Financial Assurance for RCRA non-TSD facilities.

GOAL 4: HEALTHY COMMUNITIES AND ECOSYSTEMS

4.1 Chemical, Organisms and Pesticide Risks

The first objective of Goal 4 Healthy Communities and Ecosystems deals with the prevention and reduction of risk to humans, communities and ecosystems by pesticides, chemicals and genetically engineered biological organisms. The strategic targets for the reduction of toxic pesticide exposure includes re-registration of chemicals, reduction of mortality incidents, reduction of chemicals in foods, increase in use of reduced risk pesticides and reduction of persistent organic pollutants (POPs). The objectives and targets failed to list the baseline numbers, chemicals, organisms, quantities, concentrations, and acreage. Without the baseline, it will be difficult if not impossible to track the progress and to determine if the objectives are being met.

The second objective targets the availability of pesticides and antimicrobial products that meet the latest safety standards. The strategic targets focus on the reduction in registration time by 10% and propose new registration actions meet new health standards and are environmentally safe. The strategic targets lack background time frames and health safety standards. The reduction in time for registration should not be encouraged at the expense of less effective and protective re-registrations.

The third objective focuses on the prevention and reduction of risk to human health, communities and ecosystems from chemicals and biological organisms. Baseline data was not included for industrial chemicals and mercury. Without background data, it is not possible to determine if the objectives are being met.

The fourth objective focuses on facility risk reduction and building community infrastructures. The first strategic target fails to specify how much risk reduction will be required. The second strategic target establishes a 50% local community or LEPC goal for incorporating facility risk information by 2010. However the facility risk management information is not made publicly available due to terrorism threats.

The objectives and strategic targets for objective 1 are very positive and extremely ambitious. The resources required to fund the objective may limit the ability to fully implement the strategies. The program for objective 1 lacks a mechanism to track the implementation of the program. A mechanism to measure the impact the program is having on human health and the environment has not been included in the program. This is a critical element to be measured in order to track the success of the program.

4.2 Community Health

The first objective deals with sustaining community health. The number of communities to be involved by 2008 is set forth. However, the means and strategies for sustaining health communities is more a description of the components of the program and does not identify specific strategies for involving and improving the 220 communities.

The second objective deals with addressing disproportionate impacts and risks experienced by Environmental Justice communities. The strategies identified are current EPA programs, EJ small grants program, NEJAC Council and Subcommittees, Interagency Working Group on EJ issues training. The strategies merely work within the

current program framework and do not identify specific strategies for attaining a 50% increase in the number of communities working with EPA to address EJ issues. The objective also fails to identify the baseline on which the 50% increase will be based and measured.

The third objective addresses Brownfields redevelopment. The strategy is the continuation of the existing Brownfields program. This objective and strategy is merely a continuation of an ongoing program. EPA indicates that ***“Through 2008, redevelopment of brownfield properties will generate \$10.2 billion and create 33,700 jobs.”*** The EPA should avoid claims that expenditures on environmental improvement by other agencies “create” jobs. The use of labor and capital to improve the environment divert productive resources from other uses – “there is no such thing as a free lunch” – private or public funds used to protect the environment must be weighed against alternative uses of fund.

The fourth objective focuses on US-Mexico border issues. The objective will assess and improve the quality of border surface water bodies and connect 1.5 million people to potable water and waste water systems. This objective is extremely large and will require extensive financial resources to implement.

The objectives and strategies do not include mechanisms to track the programs as they are implemented and measure program performance and degree to which the objectives are being met.

The third objective focuses on the restoration and protection of 28 estuaries. The objectives and strategies are part of existing programs. Each program is estuary specific and targeted at addressing specific issues in the individual estuaries. The programs are extremely ambitious and will require the dedication of high quantities of financial resources. The unavailability of financial resources could have a dramatic impact on the goals set forth in the plan.

The fourth objective deals with Homeland Security. This is the new emerging issue being addressed by the Agency. The objectives are appropriate to the development of Homeland Security programs. The subobjective 4.4.2 should be required to be implemented by 100% of the facilities by 2008. The industrial facilities have the resources and are in need of their own security measures to reduce vulnerability and protect communities and the environment from chemical releases.

The third objective deals with enhanced ambient air monitoring and emergency air monitoring. These monitoring efforts are not only necessary for Homeland Security, they are also necessary to protect communities living around industrial facilities, waste sites and businesses handling and processing toxic chemicals. The expansion of these efforts should be focused on protection of the population during normal operating conditions as well as during special security events.

Goal 4 page 30 presents a strategy for addressing the need for additional air monitoring capabilities including mobile monitoring. These capabilities are also needed by communities located in close proximity to industrial facilities in order to identify and quantify toxic chemicals in the communities.

The Science and Research objective is a broad ranging program designed to bring together programs, initiatives and agencies to protect and restore human health and the

environment. The objective will require substantial financial resources in order to be successful. The lack of available resources could have a detrimental impact on the objective. There is a need to have a mechanism to monitor and track the progress as the objective is implemented.

GOAL 5: COMPLIANCE AND ENVIRONMENTAL STEWARDSHIP

NACEPT's previous comments on EPA's Strategic Plan architecture suggested that EPA had not incorporated previous recommendations that the Goals and Objectives of each Program Office reflect the Agency's commitment to Compliance Assistance (CA). The current Strategic Plan suggests that these recommendations still have not been adopted by the Agency. This is most apparent in the Means and Strategies for the various Objectives in Goals 1 through 4. These Means and Strategies focus on the activities that EPA's Program Offices will undertake to enhance *implementation* of program components and regulatory standards, both by EPA and its regulatory partners (states, tribes and other delegated authorities). However, these Means and Strategies do not address the actions that will be required of the regulated community to achieve these national Goals, nor the barriers (informational, technological and economic) that they will face in achieving compliance. Failure to integrate CA into all of the Program Offices' Goals and Objectives will likely result in continued over-reliance on enforcement instead of the win-win scenarios engendered by a fully integrated program of CA, voluntary program, and partnerships.

An example of the disconnection between Program Office Objectives and the need to integrate CA into those objectives can be seen in the water arena, under Objective 2.2—Protect Water Quality. The Means and Strategies to achieve this objective on a watershed basis identify six key areas in which EPA will focus its work *with states, tribes and others*: (1) strengthen the water quality standards program; (2) improve water quality monitoring; (3) develop effective watershed plans and total maximum daily loads; (4) implement effective non-point pollution control programs; (5) strengthen the National Pollutant Discharge Elimination System (NPDES) permit program; and (6) effectively manage infrastructure assistance programs.

Firstly, it is agreed that the watershed approach is the appropriate scale for effectively addressing water quality issues. Secondly, it is recognized that continued funding of the Clean Water State Revolving Funds and linking project grants to integrated watershed approaches and environmental results will facilitate improved environmental performance in the municipal wastewater sector. In addition, optimizing the other five key areas is essential to effective watershed management. However, addressing these key areas alone does not empower the regulated community (with the exception of the municipal wastewater sector) to achieve compliance and more importantly, to improve environmental performance, the outcome necessary to attain water quality objectives. Instead, focusing on these six key areas will produce a more efficient and effective oversight system for identifying noncompliant regulated entities for traditional enforcement action, once noncompliance has been identified.

Objective 5.1: Improve Compliance

With EPA continuing in its role as “developer/wholesaler” of CA products, the burden of retail delivery of CA to the regulated community will increasingly fall upon the network of states, tribes, local governments, trade associations, economic development agencies and community based organizations. Each of these retailers will continue to face budgetary pressures similar to those faced by the Agency. In this economic environment, EPA will need to move beyond its perceived role as developer/wholesaler of CA products to include management of the CA

delivery network. This role will require EPA to assess the performance of the entire CA delivery network and to actively facilitate network optimization. Additionally, EPA will need to optimize CA tool development by actively encouraging and funding tool development and distribution across the entire CA network, rather than in its current EPA-centric approach.

EPA estimates that approximately 41 million federal, public and private facilities are subject to regulation by the Agency under various environmental statutes. Yet it is only under this Objective, managed by the Office of Enforcement and Compliance Assurance (OECA), that the Strategic Plan discusses the need to impact the behavior of this diverse regulated community.

With regard to the specific targets under this Sub-objective, it is unclear how EPA intends to collect information and measure progress toward the targets. The Agency currently has a number of information collection systems in place track environmental emissions [e.g., Toxic Release Inventory (TRI), NPDES Discharge Monitoring Reports, Pretreatment Program Reports]. Each of the Agency's reporting systems is designed to assess a particular regulatory program, and may do so with particular clarity. But these systems do not measure the same parameters nor are they integrated across Programs, sometimes yielding conflicting results. For example, under the TRI, the highest quantities of toxic pollutants transferred to publicly owned treatment works (POTW) are nutrients (nitrates and phosphates) and acids/alkalis, yet these materials do not cause widespread interference with POTW operations nationally, since they are compatible with POTW processes (nutrients) or they are neutralized by the generating facility prior to discharge (acids/alkalis). EPA needs to integrate its various measurement systems into a single, consolidated system in order to measure reductions in pollutant generation and emission in a meaningful way. Additionally, current reporting systems do not extend to all generators nor are all reported data collected in EPA-maintained systems. EPA's Central Data Exchange (CDX) has been identified as the Agency's approach toward addressing these issues. To ensure success, the CDX will need to be designed and built with sufficient capacity to collect all of the currently reported and anticipated environmental data currently being generated across the Agency's Program Offices as well as by the states, tribes, local government, community-based organizations and the private sector. Finally, the CDX must be made sufficiently user-friendly and efficient that reporting entities across the country will readily accept the system in favor of current reporting systems.

Beyond measuring pollutant reductions, measuring improved understanding of environmental regulations and improved environmental practices will present unique challenges to EPA. Traditionally, changes in understanding and behavior are measured through pre/post-delivery surveys of assistance recipients. These surveys can be resource intensive and are generally not value-added. To effectively measure changes in understanding and behavior, EPA will need to develop, implement and facilitate use of a validated measurement system by the full spectrum of CA providers as well as the Agency.

Sub-objective 5.1.2: Compliance Incentives

NACEPT previously commented that this Sub-objective, as proposed in the draft Strategic Plan architecture, did not measure the number of facilities conducting environmental audits or the number of facilities that are encouraged to perform audits as a result of EPA's audit policy. Instead, the then-proposed Sub-objective measured the number of facilities reporting violations

under the audit policy. Thus, progress towards that Sub-objective appeared to require an increased amount of noncompliance by facilities performing audits.

The current Sub-objective appears to correct this issue by measuring progress as an increased percentage of facilities conducting audits, rather than focusing on the number of violations disclosed during audits.

Sub-Objective 5.1.3: Monitoring and Enforcement

It is unclear whether EPA intends to limit this Sub-objective to monitoring and enforcement activities conducted solely by EPA, or if the Agency intends to include monitoring and enforcement activities undertaken by delegated authorities. This distinction is critical since the majority of monitoring and enforcement is not conducted directly by EPA, but by a network of delegated authorities (e.g., states, tribes, regional air management districts, Publicly Owned Treatment Works). Additionally, many of these delegated authorities enforce state and/or local regulations that go beyond federally mandated minimums. Will EPA evaluate monitoring and enforcement for local regulations as equivalent to federal regulations?

Each of the three specific targets under this Sub-objective presents unique verification and measurement challenges to EPA and delegated enforcement agencies.

The first target (*3% increase in the number of complying actions taken during inspections*) appears to presume a constant level of inspection activity. However, this scenario is clearly not realistic. Fluctuations in inspection activity will cause this measure to fluctuate independent of the Agency's desire to increase the frequency of complying actions taken during such inspections. EPA should revise this target to focus on increasing the percentage of inspections resulting in complying actions taken during the inspection. EPA also faces significant barriers in identifying complying actions and quantifying their impact on a regulated entities environmental performance. Will complying with procedural or reporting requirements be weighted equally with complying actions that result in reduced pollutant generation or emission?

As stated, the second target (*3% increase in the percentage of enforcement actions requiring that pollutants be reduced, treated, or eliminated*) seeks to increase the percentage of enforcement actions requiring pollutant reduction. This appears to be a measure of the administrative savvy of the Agency's enforcement staff. A more meaningful measure would be an increase in the percentage of enforcement actions that result in a measurable decrease in the generation and/or emission of pollutants.

The third target (*3% increase in the percentage of enforcement actions requiring improvement of environmental management practices*), while clearly a desirable outcome of enforcement actions, will be difficult to quantify, as it seeks to measure changes in behavior. As discussed earlier under Sub-objective 5.1.1, EPA will need to develop, implement and facilitate use of a validated system for measuring behavior changes by the regulated community.

Objective 5.2: Improve Environmental Performance through Pollution Prevention, Innovation, and Analysis

Sub-objective 5.2.1: Pollution Prevention by Government and the Public

EPA's strategic targets for Federal Facilities and federal agencies are appropriate both in that they appear to be achievable by 2008 and that they will serve as a clear signal states, tribes, and the regulated community that the federal government must clearly lead by example.

Sub-objective 5.2.2: Pollution Prevention by Industry

The first two strategic targets under this Sub-objective are achievable and measurable, within the limits of the TRI system. But EPA must remember that not all waste generating activities are reported under the TRI, and as discussed earlier, some waste transfer activities reported under TRI are entirely acceptable under environmental regulations and accepted business practices, and do not result in chemical releases to the environment.

It is not clear how EPA intends to measure progress toward the third strategic target under this Sub-objective (conserve 400 billion BTUs of energy and 10 billion gallons of water, reduce 93 thousand metric tons of CO₂ emissions, and save \$1 billion of unnecessary costs as a result of pollution prevention activities).

EPA will need to enhance its information collection to include production indices or other suitable economic data to enable assessment of production normalized TRI chemical releases and waste production. EPA's limited experience in this area in the Metal Finishing Sector Strategic Goals Program indicates that this effort will impose a substantial reporting burden on the regulated community and a data management burden on the Agency.

Sub-objective 5.2.3: Business and Community Innovation

The aggregate annual environmental improvements for Performance Track members (reductions of: 3% in water use; 3% in energy use; 3 % in total solid waste; 1% in air releases; and 5% in water discharges) are substantially less ambitious than some of the improvements demonstrated by Performance Track members in 2002. While continuing Performance Track members would not be expected to sustain their 2002 performance gains annually, the population of Performance Track members is expected to expand through 2008. Therefore, the aggregate annual environmental improvements identified under this strategic target may prove not to be particularly ambitious. EPA should assess whether these environmental improvement targets constitute a sufficiently ambitious goal for the Performance Track program.

The small business outreach and technical assistance target of 750,000 contacts annually is a 66 percent increase above the 2001 baseline of 450,000 contacts. Recognizing that the vast majority of small business assistance activities are carried out by state, tribal and local assistance providers and not EPA itself, this target may not be achievable without substantial EPA investment in increasing the delivery capacity of the assistance network.

Except perhaps as a budget management exercise, it is unclear why EPA would need to segregate the Performance Track program from other environmental performance efforts, such as sector-based initiatives and its Environmental Management System (EMS) efforts. From the regulated community's perspective, segregation may appear to put EPA's in conflict and cause

potential participants to choose one program over another. EPA should strive to eliminate the distinctions between its environmental performance programs and seek to manage each as a focused approach within a suite of performance tools. As discussed previously relative to the aggregate annual environmental improvement targets for Performance Track members, EPA's environmental improvement targets for its sector-based initiatives and EMS efforts may prove not to be particularly ambitious. Of particular concern is the apparently lowly target of aggregate annual increase of 100 facilities using EMS.

Sub-objective 5.2.4: Environmental Policy Innovation

In an era when scientific and technological advances and capabilities appear at ever increasing rates, EPA must assume a leadership role in identifying, evaluating and adopting successful innovative approaches to environmental protection. In the long run, this activity may have the most significant impact of all Agency activities identified in EPA's Strategic Plan. In its Means and Strategies for achieving Objective 5.2, EPA commits itself to broadening solicitation of state and tribal innovation projects and to funding the most promising projects through the State Innovation Grant Program. And while the strategic targets under this Sub-objective call for substantial increases in Agency activities above 2002 baselines, the actual annual activity targets set by EPA suggest that the Agency may not be building sufficient capacity to rapidly identify, evaluate and adopt innovation in pace with scientific and technological advancement.

EPA should implement a strategy of continuously assessing its innovation capacity and develop a flexible evaluation system that can respond rapidly to emerging environmental protection innovations.

Objective 5.4: Science/Research

While EPA recognizes that in large part, its success lies in the hands of its delegated authorities and the regulated community, the Agency must not minimize its capability, or its obligation, to influence that greater community. While noncompliance with regulations can and should be met with timely and effective enforcement action, EPA also recognizes that the future of environmental protection is evolving; from police power over a regulated community to strategic business partnerships across diverse communities and affiliations. While some of the obstacles to realizing this new vision of environmental protection are indeed external to the Agency, others, such as lack of coordination across Media and Program Offices, are internal to EPA and endemic to the Agency's business structure. Appropriately, EPA itself recognized this issue in its discussion of Cross-Goal Strategies in the Strategic Plan,

“Among the problems identified by the evaluation of the Performance Partnership System described above was that EPA's priority-setting and planning processes (including PPAs, issuance of national program guidance, budgeting, and accountability systems) are not aligned in a way that fosters joint planning and priority-setting across media program lines; EPA and state staff have limited experience with collaborative approaches to environmental problem-solving; strong media program perspectives and loyalties still dominate many aspects of state-EPA relationships; and there are few incentives for state and federal staff to risk new ways of doing business.”

While these observations arose in the context of evaluating the EPA-State Performance Partnership System, the problems identified have equally detrimental impact on the Agency's own activities. NACEPT recommends that, in addition to the Objectives set for the Agency throughout its Strategic Plan, EPA set for itself the additional objective eliminating these problems within its own house.